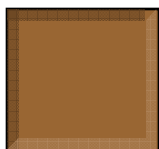




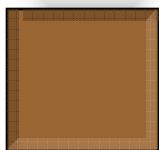
# WASTE CODE REVISION



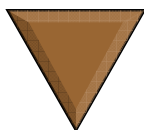
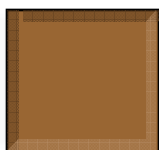
Waste Codes



Permits



Examples



## DEPARTMENT OF TOXIC SUBSTANCES CONTROL

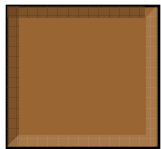
*Gary Murchison, P.E.*  
*gmurchis@dtsc.ca.gov*  
*(916) 322-0807*

December 2006

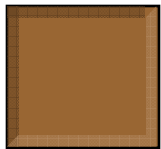


# Overview – Purpose of Workshop

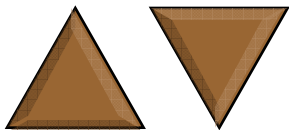
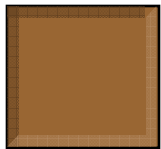
Waste Codes



Permits



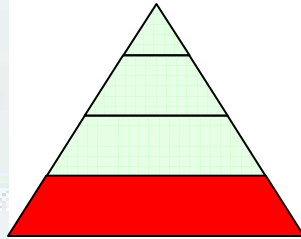
Examples



- To Inform -
  - Current Use of Codes
  - Why change Waste Codes;
  - What are DTSC's Objectives;
  - Present draft proposal
- To Discuss -
  - Provide forum for open discussion
  - Hear alternatives

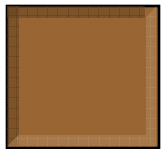
December 2006

Slide 2

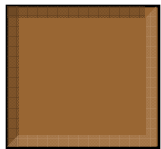


# Current Use

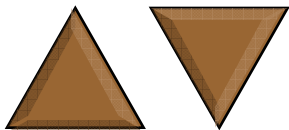
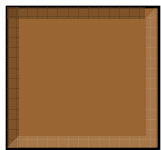
Waste Codes



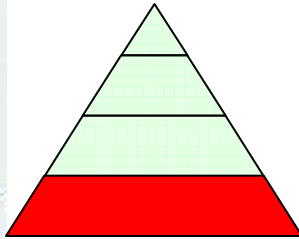
Permits



Examples



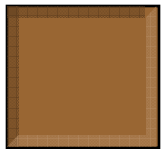
- Manifest - Waste & Handling Codes
- Permits - Restricts what can be accepted
- Data Collection – Manifest data in computer database for analysis
- Planning – DTSC relies on data for many decisions



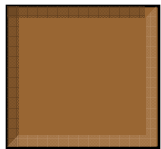
# Why Change – Legislative

(H&SC 25160.1)

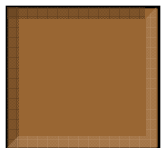
Waste Codes



Permits



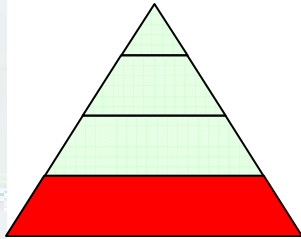
Examples



- **Restrict use of RCRA codes** - use RCRA codes only for RCRA waste
- **State Codes** - Consistent with RCRA; based on hazard
- **Benefit Compliance** – Codes can be changed to benefit compliance
- **Benefit Management** – Codes can be changed to benefit proper management

December 2006

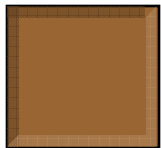
Slide 4



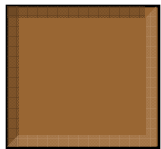
# Why Change – Legislative

(H&SC 25175)

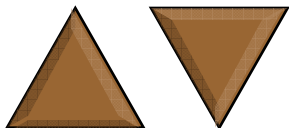
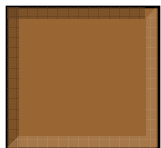
Waste Codes



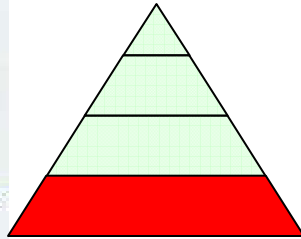
Permits



Examples

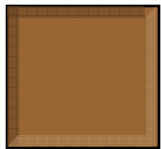


- Ensure recyclable waste are recycled
  - Identify recyclable waste (CCR 66266.2 (b))
  - Investigate if not recycled

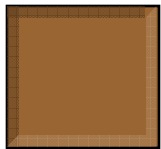


# Why Change – Problems

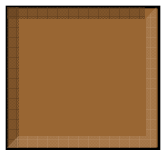
Waste Codes



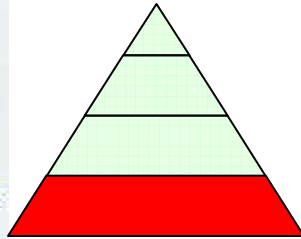
Permits



Examples

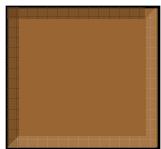


- **Undefined** - There are no definitions for what current waste codes cover
- **No Selection Criteria** - Often waste can fit into more than one category; The generator is left to decide which code to choose
- **Not related to Hazard** - Codes often are not related to reason waste is hazardous
- **Confusion by small generators** - Waste classification and coding not clear; Transporters, TSDFs must help

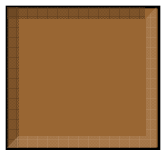


# DTSC Objectives:

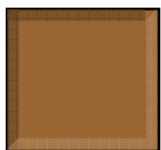
Waste Codes



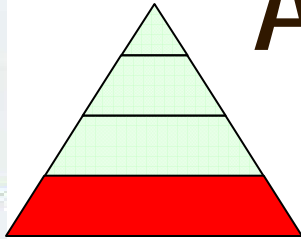
Permits



Examples

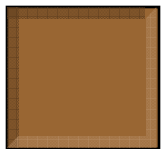


- Meet legislative objectives
- Understandable requirements
- Codes that provide useful information
- Balance need for information with burden on regulated community

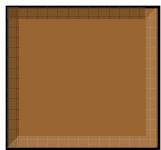


# Additional Legislative Objectives

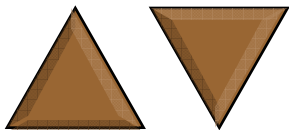
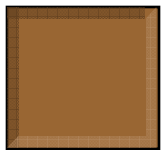
Waste Codes



Permits



Examples



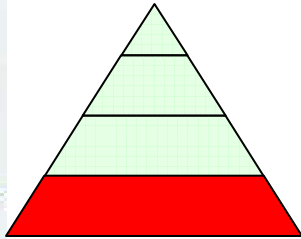
## ■ SB 606 (H&SC 25175)

- Adopt list of recyclable wastes and encourage recycling of wastes

## ■ Fees Tracking

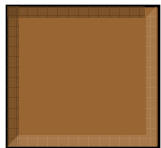
- Identify wastes that qualify for reduced fees



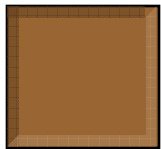


# Additional Objectives

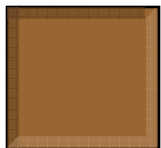
Waste Codes



Permits

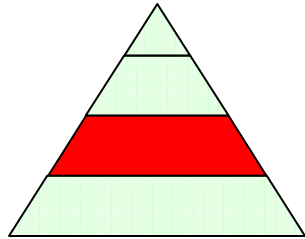


Examples



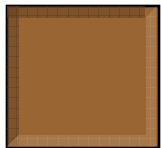
## ■ Conform to New Manifest

- Adopt codes that are not redundant of Federal RCRA codes
- Adopt Procedures Consistent with Federal requirements

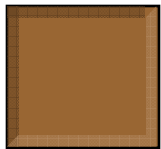


# Solutions to Problems

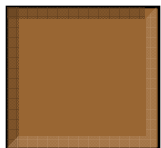
Waste Codes



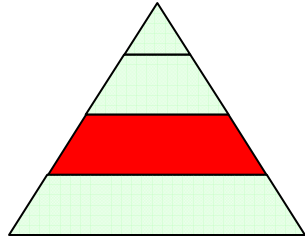
Permits



Examples

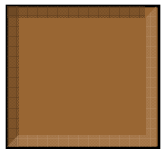


- **Undefined** - Provide definitions for all waste codes
- **No Selection Criteria** - Use selection hierarchy to ensure consistent code selection
- **Not related to Hazard** - Use codes that identify hazard or are a waste type of a known hazard type
- **Confusion by small generators** - Provide clear guidance documents, have transition period for code use and hold training sessions for use of new codes

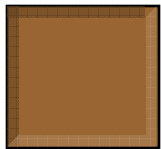


# Solution Legislative Objectives (H&SC 25260.1)

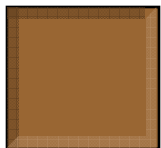
Waste Codes



Permits



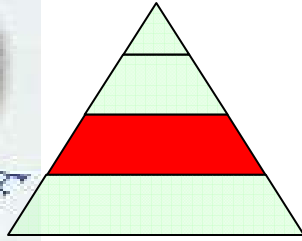
Examples



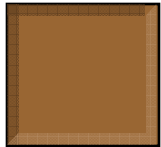
- **Restrict use of RCRA codes** - RCRA codes can only be used for RCRA waste
- **State Codes** - Based on hazard criteria or of identifiable waste type of known hazard
- **Benefit Compliance** - Codes will have definitions and allow identification of waste of special interest
- **Benefit Management** - Wastes with special management standards will have separate codes



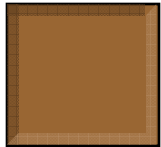
# Examples of Wastes with Special Management Standards



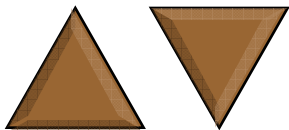
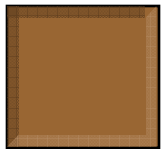
Waste Codes



Permits

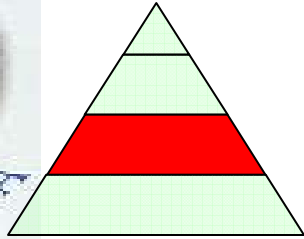


Examples

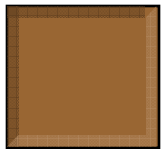


- Recyclable Waste
- Restricted Waste
- Contaminated Soil
- Asbestos

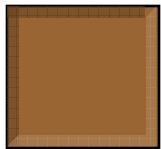
# Solution Legislative Objectives (H&SC 25175)



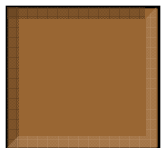
Waste Codes



Permits



Examples

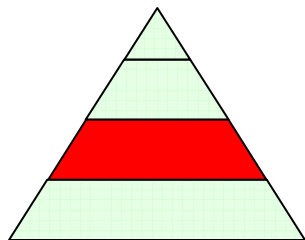


## ■ SB 606 (H&SC 25175)

- Adopt codes for recyclable wastes and investigate wastes that are not recycled

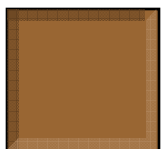
## ■ Fees Tracking

- Adopt new waste codes to identify wastes that qualify for reduced fees

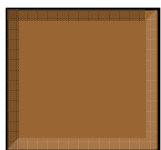


# Solutions for New Manifest

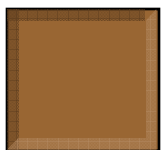
Waste Codes



Permits



Examples

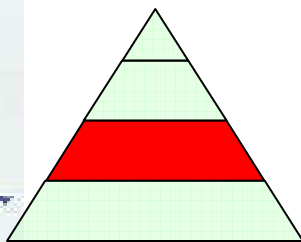


- No Duplicate Codes to RCRA codes
- Make State Codes Identifiable

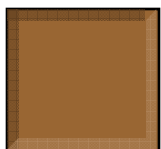


# Draft Proposed Changes

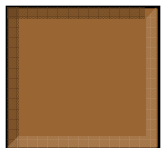
- Overview



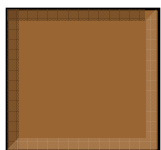
Waste Codes



Permits



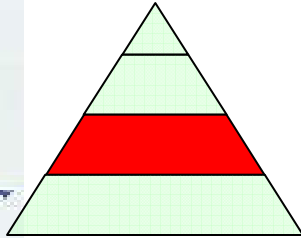
Examples



- 1) **Continue to use Appendix XII until effect date of regulation**
- 2) **On effect date use appendix XIII and CCR Section 66261.127**
- 3) **Wastes mixed after point of generation use highest volume waste to determine codes**

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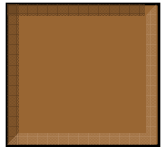
Slide 15



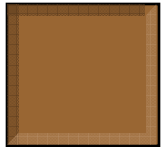
# Draft Proposed Changes

- Overview

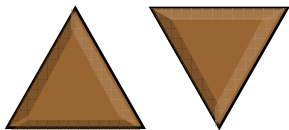
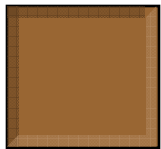
Waste Codes



Permits



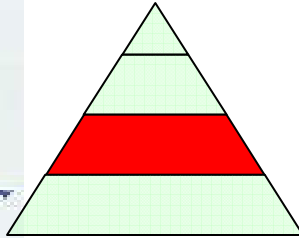
Examples



## CCR Section 66261.127

- 1) If RCRA waste use EPA and California Waste Codes
- 2) May use up six codes to describe waste
- 3) Must select California Codes using hierarch
  - Start at Table 1, procedure through tables, select first code
- 4) California Waste Code have alpha character at end

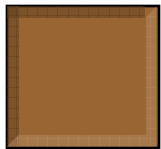




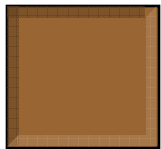
# Draft Proposed Changes

- Alpha characters

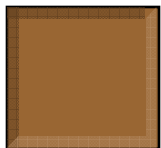
Waste Codes



Permits

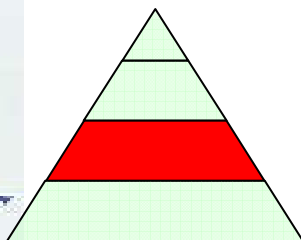


Examples



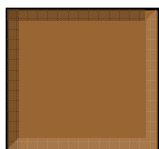
**All California Hazardous Waste Codes shall have an alpha character at the end of the number which is either a “L”, “H”, or “S” as described below:**

- (A) “L” shall be used for liquid hazardous waste with low suspended solid and that is a low viscous waste.**
- (B) “H” shall be used for liquid hazardous waste with high suspended solids or that is a highly viscous waste.**
- (C) “S” shall be used for non-liquid hazardous waste.**

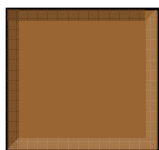


# Draft Proposed Changes Waste Code Table 1

## Waste Codes



Permits



Examples

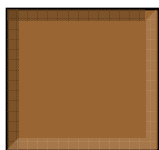


Table 1— California Priority Waste Codes

Remedial and Removal Wastes

505 -- Asbestos

510 -- Contaminated Soil approved.

512 -- Contaminated Soil w/o approval.

513 -- Contaminated Debris Waste.

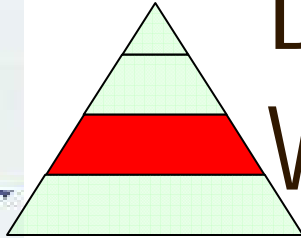
Lab Packs

521 -- Lab Packs subject to Land Disposal Restrictions (LDR).

522 -- Lab Packs without LDR restrictions.

Air Compliance Solvents

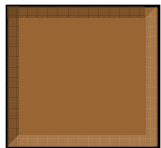
550 - Air Compliance Solvents



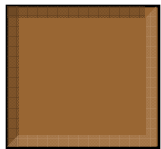
# Draft Proposed Changes

## Waste Code Table 2

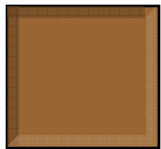
Waste Codes



Permits



Examples



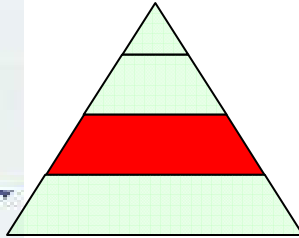
### **Table 2—California Oil Waste Codes**

**610 – Used Oil from motor vehicles**

**611 – Used Oil from sources other than motor vehicles**

**615 – Oil/Water Separator Waste**

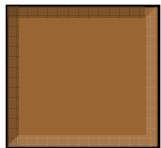
**616 – Oil and Water Mixtures**



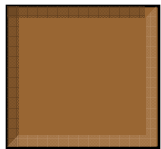
# Waste Code Table 3

## Table 3 California Recyclable Waste Codes

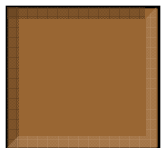
Waste Codes



Permits



Examples



### Recyclable Chemicals

621 -- Acetone: a.k.a. – Dimethyl formaldehyde, methyl ketone

622 -- Benzene: a.k.a. - Benzol, carbon oil, coal naphtha

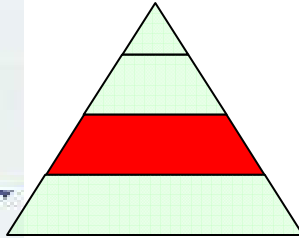
.....

639 – Mixtures: contains more than one chemical

### Other Potentially Recyclable Waste

641 -- Aqueous Parts Cleaning Solvents

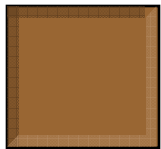
642 -- Non-Aqueous Parts Cleaning Solvents



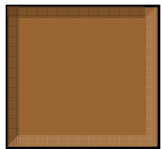
# Waste Code Table 3

(Continued)

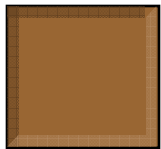
Waste Codes



Permits



Examples



## Table 3 California Recyclable Waste Codes

### Other Potentially Recyclable Waste

643 – Spent Photographic solution

644 – Dry Cleaning solvents

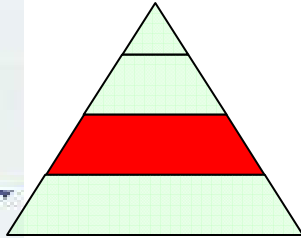
645 – Sludge contaminated with dry cleaning solvent

646 – Paint related wastes

647 – Lead-acid Batteries

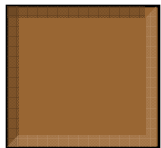
648 – Universal waste

642 – Non-Aqueous Parts Cleaning Solvents

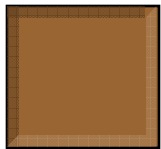


# Draft Proposed Changes Waste Code Table 4

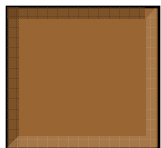
Waste Codes



Permits



Examples



**Table 4 – Listed or Potentially Restricted Waste Codes**

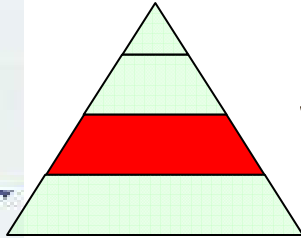
Mercury containing products as defined in California Code of Regulation, title 22, section 66261.50

701 – Motor Vehicle Switches

702 – Non-automotive Switches

703 – Lamps

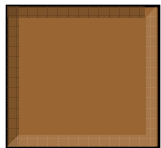
704 – Novelties



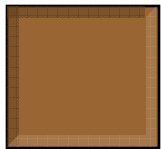
# Draft Proposed Changes

## Waste Code Table 4 (Continued)

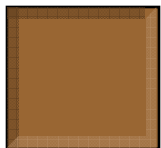
Waste Codes



Permits



Examples



### Table 4 cont. – Listed or Potentially Restricted Waste Codes

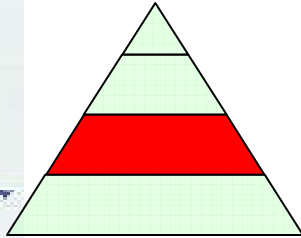
**Potentially Restricted Waste: Hazardous waste meeting the description of 731, 741 or 795 is a restricted hazardous waste. Any other code is a restricted if it is also a liquid .**

**711 – Cyanides = or > 1,000 Mg/Kg**

**721 – Arsenic = or > 500 Mg/Kg**

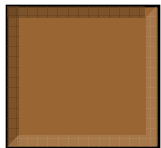
**722 - Cadmium = or > 100 Mg/Kg L**

**723 - Chrome = or > 500 Mg/Kg L .....**

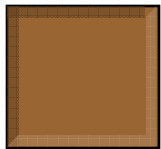


# Draft Proposed Changes Waste Code Table 5

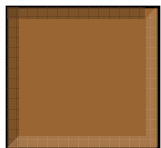
Waste Codes



Permits



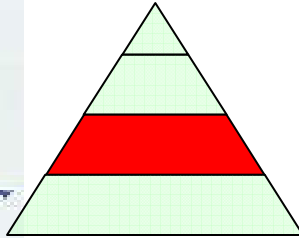
Examples



**Table 5 – California Specific Waste Type Codes**

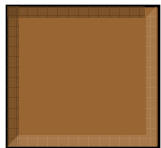
810 -- Household Waste	815 -- Treated Wood Waste
821 -- PCB Ballast Waste	823 -- Special Waste
831 -- Auto-shredder Waste	832 -- Metal Shredder
834 -- Pharmaceutical Waste	
841 -- Contaminated Container = or less than 119 gallons	
843 -- Contaminated Container more than 119 gallons	



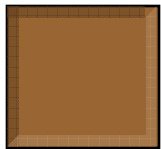


# Draft Proposed Changes Waste Code Table 6

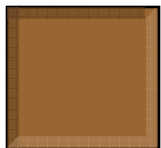
Waste Codes



Permits



Examples



**Table 6 -- California Waste Codes for Hazardous Substances**

## **Inorganic Hazardous Substances**

**954 – Antimony**

**955 – Asbestos and**

**956 – Beryllium**

**957 – Cobalt**

**958 – Copper**

**959 – Fluoride salts**

**960 – Molybdenum**

**961 – Nickel**

**962 – Thallium**

**963 – Vanadium**

**964 – Zinc**

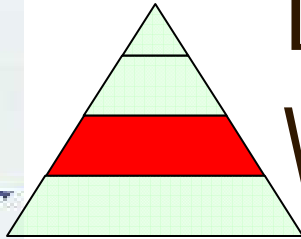
**965 – Other Inorganic Hazardous Substances**

## **Organic Hazardous Substances**

**970 – Pesticides in Table III**

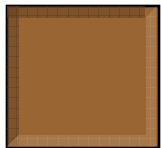
**971 – PCB < 50 Mg/Kg**

**972 – Other Organic Hazardous Substances**

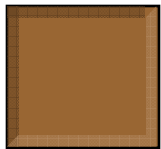


# Draft Proposed Changes Waste Code Table 7

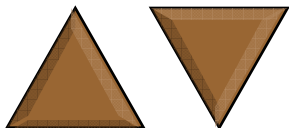
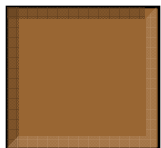
Waste Codes



Permits



Examples



**Table 7 -- California Characteristic Waste & RCRA Only Codes**

**Characteristic Waste**

980 -- non-RCRA Ignitable

981 -- non-RCRA Corrosive

982 -- non-RCRA Reactive

983 -- Acute Oral LD50

984 -- Acute Dermal LD50

985 -- Acute Inhalation LD50

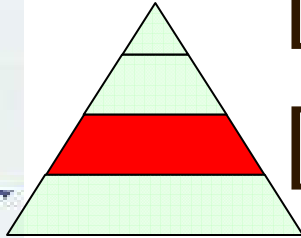
986 -- Acute 96-hour LC

987 -- Listed Carcinogens

988 -- Hazardous through Knowledge and/or Experience

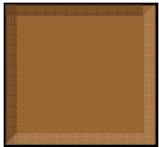
**RCRA Hazardous Only**

990 -- Hazardous waste that is subject to federal regulations

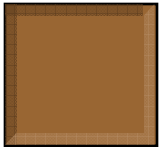


# Draft Proposed Changes DTSC Assigned Code

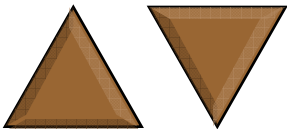
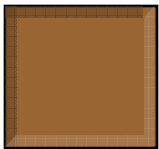
Waste Codes



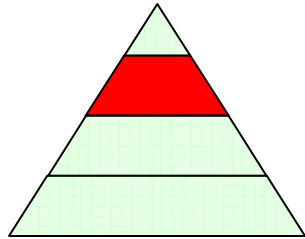
Permits



Examples

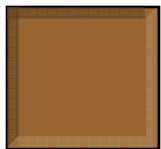


1. **Use above procedure unless Department has specifically assigned a code for a particular waste stream.**
2. **The Department will notify the person in writing of any specific assignment of a waste code.**
3. **This notification will include a description of the waste stream,**
4. **the assigned code,**
5. **and an effective date when this assigned code must be used.**

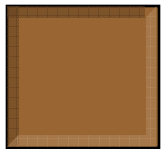


# Questions to be answered

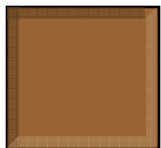
Waste Codes



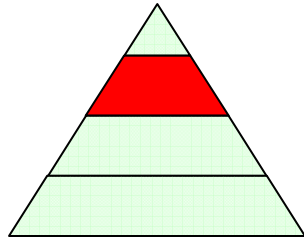
Permits



Examples

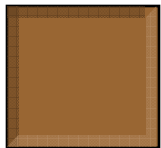


1. **Are there any implementation issues with the proposed draft regulations?**
2. **Is the language which allows facilities to operate without modifying their permit workable?**
3. **Are there any conflicts with the new manifest requirements which went into effect this September 2006?**

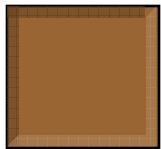


# Questions to be answered

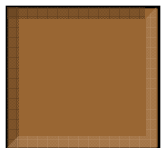
Waste Codes



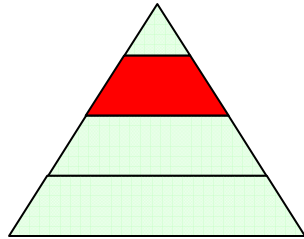
Permits



Examples

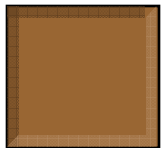


1. **RCRA Hazardous Waste will be required to use a California Hazardous Waste Code in addition to the RCRA Hazardous Waste Code. Are there any potential problems with this approach?**
2. **The proposed draft regulatory language includes a provision to allow the Department to assign new codes to specific waste without changing existing regulations. It is envisioned these new codes would be assigned to assist the Department in assessment of impacts for special projects. The subsection in the draft proposed regulations is 66261.127 (b)(2). Is this provision workable?**
3. **Are the definitions clear and appropriate?**

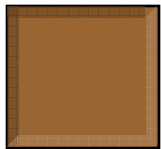


# Questions to be answered

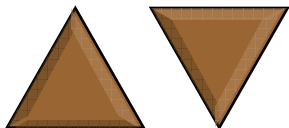
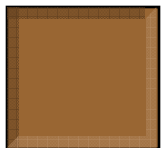
Waste Codes



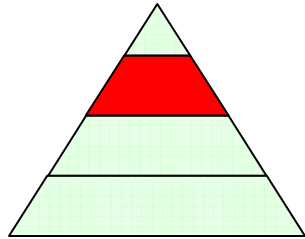
Permits



Examples

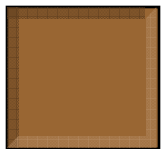


- **Should the implementation date for these regulations start on January 1st or at least 6 months after adoption?**
- **The draft proposal uses alpha characters at the beginning of the code. Could the alpha character be at the end instead?**
- **Are there any other recommendations that should be considered before the official Public Notice for these regulations is issued?**

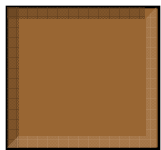


# Example Waste Streams

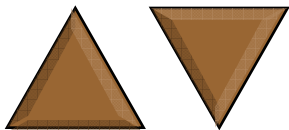
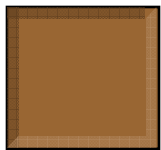
Waste Codes



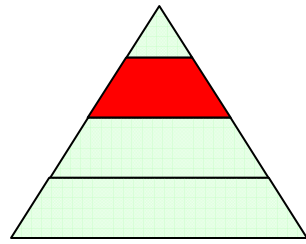
Permits



Examples

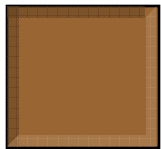


- RCRA solvent waste
- Oil and water not RCRA & not Used Oil
- Treated RCRA listed waste

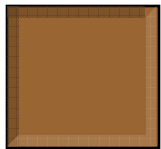


# Example Waste Streams

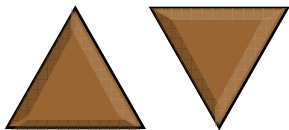
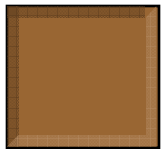
Waste Codes



Permits

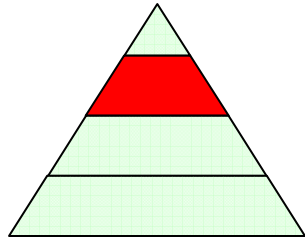


Examples



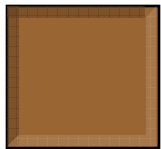
- RCRA exempt D001 waste
- Shipped on consolidated manifest
- Recyclable waste



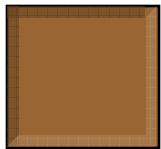


# Example Waste Streams

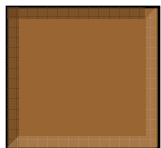
Waste Codes



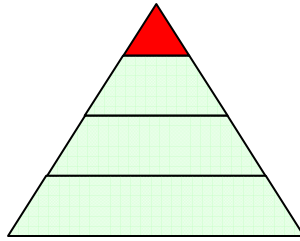
Permits



Examples

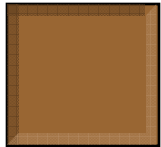


- RCRA mixed Lab Pack
- Restricted California Waste
- Contaminated soil with RCRA listed waste

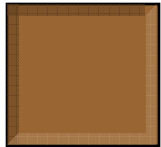


# What Next?

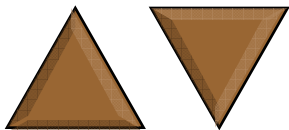
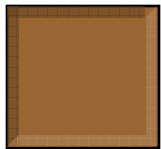
Waste Codes



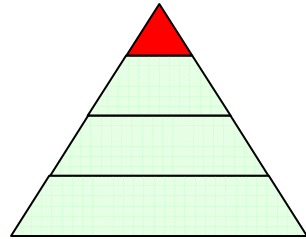
Permits



Examples

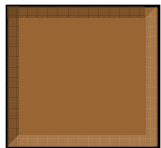


- a. 2007 - Regulations Adopted
- b. 2007 & 08 - DTSC
  - Training: Classes and Conferences
  - Guidance and Fact Sheets
  - Web Page with Presentation Download
- c. 2008 - Regulated Community
  - New Waste Codes required
  - Change Waste Profiles to Include Old Codes

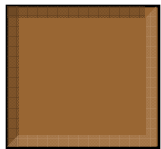


# Conclusion

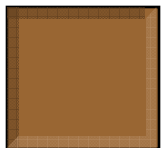
Waste Codes



Permits



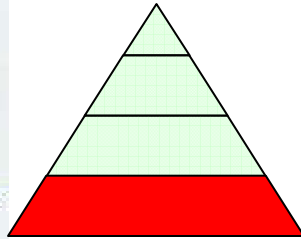
Examples



- Comments from Meeting
- Follow-up Items
- What Next?

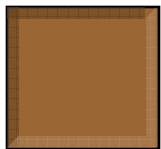
December 2006

Slide 35

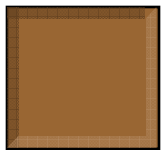


# Permit Conversion - Overview

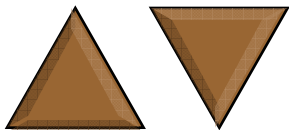
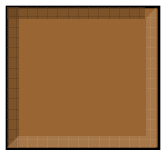
Waste Codes



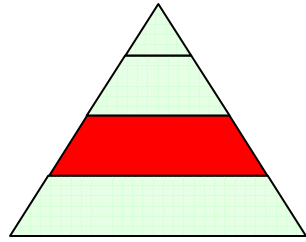
Permits



Examples

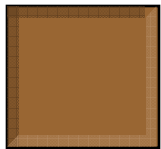


- Permit conversion by regulation
  - Along with revision of waste codes
- No change in **volume** or **type** of waste authorized
- Held separate workshop for TSDFs

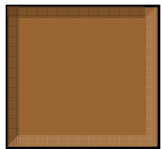


# Permit Conversion - Goals for TSDFs

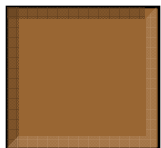
Waste Codes



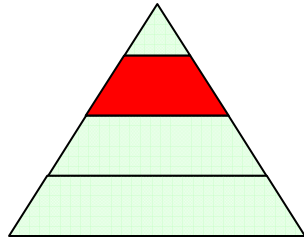
Permits



Examples

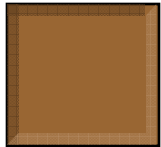


- No change in **Volume** or **Type** of Waste managed
- Regulation works with existing permits without direct modification
- Minimum impact on existing operations
- Regulation is enforceable

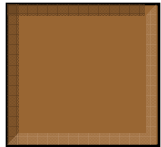


# Permit Conversion – Draft Proposal

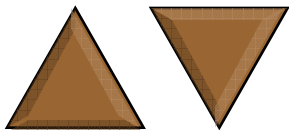
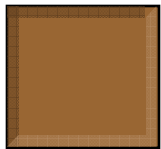
Waste Codes



Permits



Examples



**(A) Obtain from the generator waste code contained in Appendix XII.**

**(B) Obtain a certification, signed by the generator that information correct**

**(C) Add to waste profile & include the name and EPA ID Number of the generator**